

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SCHOTTENFELD QUALIFIED
ASSOCIATES LP, on behalf of itself and
all others similarly situated,

v.

WORKSTREAM, INC.; MICHAEL
MULLARKEY; AND DAVID
POLANSKY,

Defendants.

CASE NO. 05-CV-7092(CLB)

STIPULATION & ORDER


It is hereby stipulated and agreed this 14th day of February 2008, by and
between the undersigned counsel, on behalf of their respective clients, as follows:

1. In view of the pendency of a potential resolution of the claims in this
action, the Motion of Defendants for Judgment on the Pleadings [Docket Nos. 53-55] filed with
the court on July 27, 2007 (the "Motion"), shall be withdrawn without prejudice.

2. In the event that the settlement should not become effective, or shall be
terminated, the Motion shall be automatically reinstated by notice being given to the Court by
counsel to Defendants, and the parties shall revert to their respective statuses with respect to the
Motion as they existed immediately prior to January 28, 2008, with (a) Defendants having the
opportunity to file a final Reply Memorandum within ten (10) business days after giving notice
of the reinstatement of the Motion; and (b) the Motion thereupon being deemed fully submitted
for decision.

Dated: February 14, 2008

SHALOV STONE BONNER & ROCCO LLP

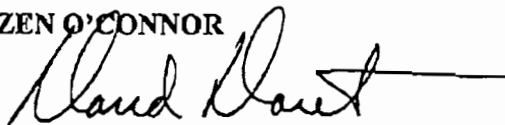


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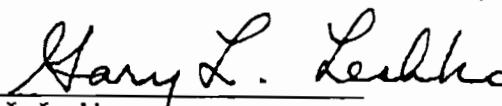
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Counsel for Defendant Workstream, Inc.

SO ORDERED:

Wm to Plans, N.Y.
February 19, 2008

Monica Brucato
USDC Briant, J.

PHILADELPHIA\3548005\1 177282.000

BLEAKLEY PLATT & SCHMIDT, LLP

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Date: February 15, 2008

File: 08327-00006

ADDRESSED TO:	TELEPHONE NO.	FACSIMILE NO.
Hon. Charles L. Brieant, U.S.D.J.	(914) 390-4077	(914) 390-4085
Charles I. Miller, Esq.	(860) 346-5244	(860) 347-9706

FROM: Thomas G. Bailey, Jr.

RE: Westchester Country Club – E-Payroll Plus, Inc.

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Thank you.



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February 15, 2008

VIA FACSIMILE – 914-390-4085

Honorable Charles L. Brieant
United States District Court for the Southern
District of New York
United States Courthouse
300 Quarropas Street - Room 275
White Plains, NY 10601-4150

Re: Schottenfeld Qualified Associates, LP v. Workstream, Inc., et al.
United States District Court
Southern District of New York
Case No. 05-CV-7092 (CLB)

Dear Judge Brieant:

Please find enclosed a courtesy copy of the Stipulation that was filed with the Court today.

Respectfully,

COZEN O'CONNOR

By: David M. Doret

DMD:db
Enclosure

cc: Ralph M. Stone, Esquire
Ronen Sarraf, Esquire
Gary L. Leshko, Esquire

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